

LTL ATTORNEYS LLP

Enoch H. Liang (SBN 212324)
enoch.liang@ltlattorneys.com
601 Gateway Boulevard, Suite 1010
South San Francisco, California 94080
Tel: 650-422-2130
Fax: 213-612-3773

LTL ATTORNEYS LLP

James M. Lee (SBN 192301)
james.lee@ltlattorneys.com
Caleb H. Liang (Bar No. 261920)
caleb.liang@ltlattorneys.com
300 S. Grand Ave., 14th Floor
Los Angeles, California 90071
Tel: 213-612-8900
Fax: 213-612-3773

HUNG G. TA, ESQ. PLLC

Hung G. Ta
hta@hgtlaw.com
JooYun Kim
jooyun@hgtlaw.com
Natalia D. Williams
natalia@hgtlaw.com
250 Park Avenue, 7th Floor
New York, New York 10177
Tel: 646-453-7290
Fax: 646-453-7289

Proposed Co-Lead Counsel for Movant Arman Anvari and the Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BRUCE MACDONALD, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN,
an Individual, ARTHUR BREITMAN, an
Individual, TIMOTHY COOK DRAPER, an
Individual, DRAPER ASSOCATES, JOHANN

Case No. 3:17-cv-07095-RS

**DECLARATION OF HUNG G. TA IN
OPPOSITION TO COMPETING
MOTIONS FOR LEAD PLAINTIFF AND
APPROVAL OF COUNSEL**

CLASS ACTION

1 GEVERS, DIEGO PONZ, GUIDO
 2 SCHMITZKRUMMACHER, BITCOIN
 3 SUISSE AG, NIKLAS NIKOLAJSEN, and
 4 DOES1-100, INCLUSIVE,

5 Defendants.

Judge: Hon. Richard Seeborg
 Courtroom: 3, 17TH Floor

6 GGCC, LLC, an Illinois Limited Liability
 7 Company, Individually and on Behalf of All
 8 Others Similarly Situated,

9 Plaintiff,

10 v.

11 DYNAMIC LEDGER SOLUTIONS, INC., a
 12 Delaware corporation, TEZOS STIFTUNG, a
 13 Swiss Foundation, KATHLEEN BREITMAN,
 14 an Individual, ARTHUR BREITMAN,

15 Defendants.

Case No. 3:17-cv-06779-RS

16 ANDREW OKUSKO, individually and on
 17 behalf of all others similarly situated,

18 Plaintiff,

19 v.

20 DYNAMIC LEDGER SOLUTIONS, INC.,
 21 THE TEZOS FOUNDATION, KATHLEEN
 22 BREITMAN, ARTHUR BREITMAN, and
 23 TIMOTHY DRAPER,

24 Defendants.

Case No. 3:17-cv-06829-RS

25 ANDREW BAKER, individually and on behalf
 26 of all others similarly situated,

27 Plaintiff,

28 v.

DYNAMIC LEDGER SOLUTIONS, INC., a
 Delaware corporation, TEZOS STIFTUNG, a
 Swiss Foundation, KATHLEEN BREITMAN,
 an Individual, ARTHUR BREITMAN, an
 Individual, JOHANN GEVERS, an individual,
 STRANGE BREW STRATEGIES, LLC, a
 California limited liability company, and DOES
 1 through 100 inclusive,

Defendant.

Case No. 3:17-cv-06850-RS

1 I, Hung G. Ta, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC, proposed Lead Counsel for
3 the putative class in the above-captioned action (the “Action”) and counsel to proposed Lead Plaintiff
4 Arman Anvari. I am an active member in good standing of the bar of the State of New York and will
5 apply to be admitted *pro hac vice* in this matter. I submit this declaration in support of Arman
6 Anvari’s Opposition to Competing Motions For Appointment as Lead Plaintiff and Approval of
7 Counsel.

8 2. On February 4 and 6, 2018, I conferred via telephone with Mr. William Restis of the
9 Restis Law Firm, P.C. and Messrs. Joseph DePalma and Jeremy Nash of Lite DePalma Greenberg,
10 LLC, counsel for plaintiffs GGCC LLC, Pumaro LLC, and Nick Anthony (the “GGCC Group”).

11 3. During the calls, we discussed the legal and procedural dynamics at issue at this stage
12 of the proceedings, and exchanged our respective views on how the Action should be prosecuted.

13 4. The discussions revealed a concurrence of views between our respective clients and
14 our firms concerning the prosecution of the Action. Counsel for the GGCC Group offered to work
15 collaboratively with my firm in prosecuting the Action as the need may arise. Counsel for the GGCC
16 Group also explained that Pumaro LLC, a Bitcoin purchaser and Nick Anthony, a subminimum
17 investor, are ready to be included as additional named class representatives if the need arises.

18 5. I have conferred with my client, Mr. Arman Anvari, and he is in agreement with this
19 collaborative approach.

20 6. Pursuant to Local Rule 3-7(c), Mr. Anvari has reviewed the allegations set forth in the
21 pending, first-filed Complaint (Dkt. No. 1 in *GGCC, LLC v. Dynamic Ledger Solutions, Inc.*, No.
22 3:17-cv-06779-RS) and intends to adopt the substance of its allegations. However, Mr. Anvari
23 reserves the right to amend the Complaint if appointed Lead Plaintiff.

24 7. Attached as Exhibit A is the Company Extract of Trigon Trading Pty. Ltd., obtained
25 from the Australian Securities & Investments Commission.
26
27
28

1 I declare under penalty of perjury that the foregoing is true and correct, this 8th day of
2 February 2018.

3 /s/ Hung G. Ta

4 Hung G. Ta
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28